ATTN: International Tax Reform Working Group

Distinguished Representative,

I am writing to ask that the International Taxation Committee of the Ways & Means Committee for Tax Reform seriously consider the ACA proposal for reform to Residency-based taxation RBT. See link: http://americansabroad.org/files/6513/6370/3681/finalsubrbtmarch2013.pdf

Allow me on behalf of my wife and myself, to start by thanking you for giving us this opportunity to share with you our thoughts and personal frustrations surrounding this very important issue.

My wife and I have been living in Israel for over 30 years now. We both celebrated our 60th birthday this year (thank you, thank you...), and, the fact of the matter is, we're too old to even consider going back to the USA. It's much too late in life for that. We'll be totally alone, without social security, proper healthcare or pension.

We have a bank account in Israel, of course. We also have an Israeli pension fund. It is all in the open, not a single Israeli Shekel hidden anywhere. The IRS treats our account as "Offshore Accounts"... with all the draconian ramifications attached there too... The IRS fails to distinguish between people like ourselves, whose <u>primary lifetime residence</u> is in another country and those people, who live in the USA and attempt to hide accounts and funds in overseas banks and in doing so, do not pay in their fair share of running federal, state and local services. The latter clearly qualifies for the "Offshore" treatment by the IRS.

My wife and I and surely, all people like us, obey the law, pay our taxes in full, in our country of permanent residence which, in many cases is also a country of citizenship (We are both Israeli Citizens). Our financial accounts should not be treated as a standard "Offshore account" for US tax purposes.

We strongly believe and respectfully request the distinguished members of the Committee to agree that people like us, who have permanently and continuously lived in a foreign country, for 20 years or more, who are unlikely to ever return to live in the USA because we are too old and it's too late and cost prohibitive to start over, because we need to grow old among family and friends cultivated in that foreign country over so many years, be exempt from paying US taxes if our total Gross Income, for the Tax – year, is less than USD150,000.00 from any source outside the USA.

If you have any follow-up questions or additional information you'd like us to focus on, please do not hesitate to contact us.

Respectfully,

Amnon Eylat Marilyn Eylat